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June 21, 2024

VIA ECF-PACER

Magistrate Judge Miroslav Lovric
United States District Court, Northern District of New York
Federal Building and U.S. Courthouse
15 Henry Street
Binghamton, New York 13901

Re: *Adirondack Trust Company v Maha Laxmi Corp., et al.*,
1:21-cv-01334-DNH-ML (N.D.N.Y.)

Dear Magistrate Judge Lovric:

This firm represents Plaintiff Adirondack Trust Company (“ATC”) in the above-captioned action. Pursuant to the Court’s directives at the June 17, 2024 hearing and its June 18, 2024 Text Order (Dkt. 95), I write to the Court with the consent of William Nolan and Jennifer Thomas, counsel for Defendants in this action, to provide a joint status report.

The parties met and conferred via email on June 21, 2024 and have agreed to the following proposed schedule for this matter:

August 8, 2024:	ATC will serve a supplemental privilege log and any supplemental production in accordance with the Court’s directives at the June 17, 2024 hearing;
October 31, 2024:	Parties will complete all fact discovery (paper, party and non-party depositions);
October 31, 2024:	ATC will serve its supplemental forensic accounting expert disclosure, if any;
October 31, 2024:	Defendants will serve their expert damages disclosure, if any;
December 6, 2024:	Defendants will serve their amended/supplemental forensic accounting expert disclosure, if any;
December 6, 2024:	ATC will serve its expert damages disclosure, if any;
January 10, 2025:	ATC will serve its rebuttal forensic accounting expert disclosure, if any;



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January 10, 2025: Defendants will serve their rebuttal expert damages disclosure, if any;
February 28, 2025: Parties will complete expert discovery; and
April 4, 2025: Deadline for filing dispositive motions.

Please contact me if the Court has any questions.

Respectfully,

Christopher E. Buckey

cc: All Counsel of Record (via ECF-PACER)